

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND
Baltimore Division**

IN RE:

CYNTHIA A. SIMMONS
Debtor(s)

Case No.19-17836
Chapter 7

**MOTION FOR AUTHORITY TO INCUR SECURED DEBT FOR THE PURPOSE
OF MODIFYING THE TERMS OF AN EXISTING SECURED LOAN FOR REAL
PROPERTY AND NOTICE OF OPPORTUNITY TO OBJECT**

The Debtor(s) by her Attorney, Kim Parker, Esq and the Law Offices of Kim Parker, PA hereby seeks Court authority to incur secured debt for the purpose of modifying the terms of an existing secured loan for real property, and submits the following information regarding the modified loan:

1. The address of the real property is 1302 East 36th Street, Baltimore, Maryland 21218.

The holder of the secured claim is Carrington Mortgage Services, LLC, 1600 South Douglass Road, Suite 200A, Anaheim, CA 92806.

2. The amount of the proposed modified secured claim is \$172,122.60 principal balance plus capitalized interest in the amount of \$2494.48. This amount does include pre-petition arrears.
3. The monthly amount of the modified secured claim payment is \$1280.43. This amount does include real estate taxes and hazard insurance to be escrowed by the holder of the modified secured claim. The monthly escrow amount is \$395.47. The current monthly secured claim payment is \$884.96.
4. **INTEREST TERMS:**
 - A. **Fixed rate loan** with an interest rate of 4.6250% for a duration of 30 years.
5. The loan modification will not alter or affect the status or priority of any other existing lien(s) on the real property.

WHEREFORE, the Debtor submits that this loan modification is in the best interest of the Debtor and her Creditor.

Date: July 2nd, 2019

Respectfully submitted,
Law Offices of Kim Parker, PA

/s/ Kim Parker

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**NOTICE OF OPPORTUNITY TO REQUEST A HEARING
TO CREDITORS AND PARTIES IN INTEREST**

You are notified of the filing of the foregoing Motion by the Debtor requesting Court authority to incur secured debt for the purpose of modifying the terms of an existing secured loan for real property. Any interested party objecting to the loan modification must file an objection with the United States Bankruptcy Court for the District of Maryland within twenty-one (21) days after the date of this motion. You are further notified that unless an objection is filed, the Court may grant the motion without a hearing.

CERTIFICATE OF SERVICE

I hereby certify that this Motion for Approval of Loan Modification was served this 2nd day of July, 2019 electronically to those recipients authorized to receive a Notice of Electronic Filing by the Court, Chapter 7 Trustee Zvi Guttman, at zguttman@gmail.com and/or by first class mail, postage prepaid to:

Cynthia Simmons, Debtor
1302 East 36th Street
Baltimore, MD 21218

Monica Vela
Carrington Mortgage Services, LLC
Carrington Document Services
1600 South Douglas Road, Suite 200A
Anaheim, CA 92806

/s/ Kim Parker
Attorney for Debtor